



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
ONE CONGRESS STREET  
BOSTON, MASSACHUSETTS 02203-2211

February 14, 1994

Ms. Marilyn Powers  
U.S. Department of the Navy  
Northern Division - NAVFAC  
10 Industrial Highway  
Code 1823 - Mail Stop 82  
Lester, PA 19113-2090

Re: Draft Final Remedial Investigation Report for Site 8 - DPDO  
Film Processing Disposal Area, Naval Construction Battalion  
Center, RI

Dear Ms. Powers:

EPA has reviewed the above referenced document pursuant to Section 7.6 of the NCBC Federal Facility Agreement (FFA) to ensure that all the necessary revisions to the document have been made by the Navy. EPA provided comments on the Draft Phase II RI Report for Site 8 on June 14, 1993.

EPA stated in its June comment letter that it was problematic to present analyses of all possible future land uses (i.e. residential, industrial/commercial) in the risk assessment in Site 8 RI Report. The baseline risk assessment should evaluate risks for the exposure scenario which results in the greatest exposure to site contaminants that could reasonably be expected to occur. (For Site 8 the carcinogenic risks were within EPA's  $10^{-4}$  to  $10^{-6}$  risk range and the non-cancer hazard indices did not exceed 1 for any of the land use scenarios presented in the subject document.)

In its response to EPA's comment, the Navy stated that it was appropriate to present multiple exposure scenarios as the future use of this property was uncertain. EPA has noted that the draft final report retained the risk analyses for the identified multiple land uses.

EPA suggests that the Navy be consistent in its risk assessments and to use the soon to be finalized Base Reuse Plan to determine what the most reasonably expected land use is for the site and that risks be evaluated for those land uses only. EPA understands that the expected land use will be industrial/commercial.

EPA concurs with the Navy's recommendation of no further action under CERCLA for Site #8, the DPDO Film Processing Disposal Area.



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All the other necessary revisions to the document have been made by the Navy.

EPA expects that the draft final RI report will be revised in accordance with EPA and RIDEM comments. EPA expects the Navy to respond to comments as well as submit a final RI report under the deadlines outlined in the NCBC FFA. In addition, to meet the schedule for a Record of Decision this fiscal year, EPA expects the Draft Proposed Plan to be forwarded for comments by March 15, 1994 as was discussed telephonically today.

If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

Christine A.P. Williams  
Remedial Project Manager  
Federal Facilities Superfund Section

cc: Jeff Crawford  
Richard Gottlieb  
Judith Graham, RIDEM  
Lou Fayan, NCBC  
Tim Prior, US F&W  
Mary Sanderson, EPA